

FAIR PROCESSING NOTICE GUIDANCE

What is a Fair Processing Notice?

Fair Processing Notice (FPN) is a generic term used to describe the data protection clauses that tell people how their personal information will be used. A FPN is also known as data protection wording, a data protection statement or privacy notice.

What is it for?

To inform people clearly about how their personal information will be used.

A FPN should explain who you are, what you are planning to do with the personal information provided and why. In particular, it should explain anything you are planning to do with the personal information which a person might not reasonably expect. It should also state if you need to share the personal information with any other organisations for the processing purpose, for example with a mailing house.

You must obtain consent from a person if you want to share the personal information they provided with any other organisations, and do not actually need to do so to carry out the processing. For example, you might want to pass a person's contact details to an Amnesty UK office but do not actually need to do this for the person to sign up for an event run by your group.

A FPN should also be easy to understand.

Inadequate FPNs may prevent you from using and/or sharing personal information that you collect, so the wording is very important.

Where is a FPN normally found?

On paper forms, an FPN is usually placed near the signature box; on electronic forms, it should be presented in such a way that the supporter must actively do something to accept the content e.g. click on a 'I agree to' box. It needs to be displayed clearly in a prominent position and be easy to read.

Can you provide standard Amnesty wording?

You can write your own FPN. Amnesty UK can also provide specific advice in compiling clauses on a case-by-case basis – contact Amnesty UK's Data Protection Officer at dataprotection@amnesty.org.uk or activism@amnesty.org.uk. But here are some examples of when you will need a FPN and the content that should be covered.

If you're asking people to sign up for a group, the FPN should

- State who you (the group) are
- Explain what they are signing up for (what to expect)
- State how they can opt out in the future
- Explain anything else that you want to do with their personal information and ask for their permission for this

If you're asking people to take action (eg sign a petition), the FPN should

- State who you (the group) are
- Explain what will happen to their personal information when they sign the petition
- State if their information will be delivered to the target of the action (eg petition to foreign government and will therefore be out of Amnesty's control)
- State how they can opt out in the future
- Explain anything else that you want to do with their personal information and ask for their permission for this
- Ask for their permission for their personal information to be shared with Amnesty UK offices
- Ask for their permission to be contacted by the group about other things by specific communication channels – by email, by text message, by post, by telephone